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October 13, 2022

**VIA ECF**

Jennifer E. Willis,  
United States Magistrate Judge  
United States District Court 40 Foley Square, Courtroom 228  
Southern District of New York  
40 Foley Square, Room 425  
New York, NY 10007

Re: *Franco v. American Airlines, SDNY, Case No.: 1:21-cv-05918*

*Letter Motion to Seal Declaration of Susan Kaplan and Robert Rambadadt  
in Support of Our Motion to Withdraw as Counsel of Record dated October 13, 2022*

Dear Judge Willis:

We write pursuant to FRCP 5.2 and your Honor's Individual Practices to seal the unredacted version of the Declaration of Susan Kaplan and Robert Rambadadt in Support of Our Motion to Withdraw as Counsel of Record dated October 13, 2022 (the "Declaration"), which was filed exparte.

The redacted version of the Declaration, which was filed for public access on the ECF, contains privileged attorney-client communications, information regarding settlement negotiations, and impressions and descriptions of Plaintiff's emotional state of mind, as well as statements about Plaintiff's health which is protected by HIPAA.

Wherefore the undersigned respectfully request that the Court grant this motion and order the sealing the unredacted version of the Declaration and such further relief as the Court deems just and proper.

Respectfully Submitted,

A stylized handwritten signature in black ink, appearing to be 'RR' or 'R.R.' with a long horizontal flourish extending to the right.

ls/Robert Rumbaut